

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

DOCKET NO. 2019-216-T

Application of)	
)	
WORKHORSE MOVING AND)	CONSENT MOTION FOR
STORAGE, LLC)	PERMISSION TO PRESENT SHIPPER
)	WITNESS TESTIMONY BY
)	AFFIDAVIT
For a Class E (Household Goods))	
Certificate of Public Convenience and)	
Necessity for Operation of a Motor Vehicle)	

Workhorse Moving and Storage, LLC (“Workhorse” or “Applicant”) moves for permission to present the testimony of its shipper witness by affidavit. The Commission’s regulation concerning the proof required to support an application for a Certificate of Public and Convenience and Necessity for a Class E mover of household goods with statewide authority is Found in S.C. Code Regs. 103-333 (the “Regulation”).

Regarding the testimony of shipper witnesses, the Regulation states:

PC&N (Household Goods or Hazardous Waste for Disposal). An application for a Certificate of PC&N or to amend a Certificate of PC&N to operate as a carrier of household goods or hazardous waste for disposal by motor vehicle may be approved upon a showing that the application is fit, willing, and able to appropriately perform the proposed service and that public convenience and necessity are not already being served in the territory by existing authorized service. The public convenience and necessity criterion must be shown by the use of shipper witnesses, if the applicant applies for authority for more than three contiguous counties. If the commission determines that the public convenience and necessity is already being served, the commission may deny the application. The following criteria should be used by the commission in determining that an applicant for motor carrier operating authority is fit, willing, and able to provide the requested service to the public:

S.C. Code Regs. 103-133.1 (emphasis added)

In the interest of administrative economy (judicial economy in the administrative law context), the Applicant requests that the Commission allow the regulation's requirement of "use of a shipper witness" to be satisfied by the submission of an affidavit.

While the Commission's practice historically has been to allow an Applicant to take the testimony of shipper witnesses by deposition to be used at the hearing, recently the Commission has approved the use of an affidavit. *See e.g.* Application of Midlands Movers, LLC, Docket No. 2018-268-T. The Office of Regulatory Staff (the only party other than the Applicant in this Docket) would have the right to contest the adequacy of an affidavit. Counsel for the Applicant has discussed this Motion with counsel for the ORS, and the ORS does not object to the relief sought herein.

Therefore, Applicant respectfully requests the Commission allow it to present the testimony of its shipper witness by affidavit. The applicant attaches the Shipper Witness Affidavit of Francie Little as **Exhibit A** hereto

s/C. Fredric Marcinak
C. Fredric Marcinak (SC Bar #73609)
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Attorneys for Applicant

Greenville, South Carolina
August 22, 2019
120898

EXHIBIT A

EXHIBIT A

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

DOCKET NO. 2019-216-T

Application of

WORKHORSE MOVING AND
STORAGE, LLC

For a Class E (Household Goods)
Certificate of Public Convenience and
Necessity for Operation of a Motor
Vehicle

AFFIDAVIT OF
SHIPPER WITNESS

Being duly deposed and sworn, Affiant states:

1. My name is Francie Little, and my address is 151 South Daniel Morgan Avenue, Spartanburg 29306

2. I am giving this affidavit in support of the application of Workhorse Moving and Storage, LLC for a Class E Certificate of Public Convenience and Necessity with statewide authority to move household goods to points and places throughout the state of South Carolina.

3. I am employed as/by Coldwell Banker - Caine as a real estate broker and agent. I have been employed in this position since 1985, and I have been employed in the Real Estate industry since 1985. My responsibilities include real estate sales.

4. I know of the need for household goods movers in South Carolina from personal experience and from real estate industry trends. On a personal level, I frequently encounter people who are moving from one home to another, and one part of South Carolina to another. They often ask me to recommend moving companies. There are many moving companies, but ones that are good, reliable, and available are always in demand. As a realtor, I am also familiar with South Carolina's housing trends. According to the South Carolina Realtors, new listings were up 2.6% in 2018, all regions of the state experienced growth, and sales prices were up across all home sizes. Housing inventory is down because of rising demand. As the South Carolina Realtors observe:

Having the financial ability to make a move clearly seems feasible to any eager buyers amidst a health economy, whether life events such as marriage, children, employment change or desirable downsizing is the reason for moving.

I have attached a copy of the report as Exhibit A to this affidavit.

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Page 1 of 2

5. Based on my knowledge of the need for household goods movers in South Carolina, I believe the public interest would be served by granting a Certificate of Public Convenience and Necessity to Workhorse Moving and Storage, LLC. Workhorse is good, reliable, and available. The demand for movers of this type is such that, with increased demand, the market is not currently being adequately served.

6. I also would like the Commission to know that Workhorse will treat customers fairly and provide excellent customer service.

Further Affiant sayeth not.

Francie Little
Affiant

Affiant's Printed Name: Francie Little

SWORN TO ME THIS 7th day of August, 2019

Rebecca
Licence # 17753

NOTARY PUBLIC FOR SOUTH CAROLINA

My Commission Expires: 9/21/2020

Notary's Printed Name: *Rebecca E Stewart*

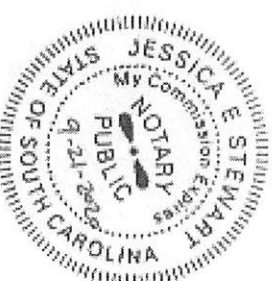


EXHIBIT B

EXHIBIT B

Annual Report on the South Carolina Housing Market

FOR RESIDENTIAL REAL ESTATE ACTIVITY FROM THE STATE OF SOUTH CAROLINA



2018



Annual Report on the South Carolina Housing Market

FOR RESIDENTIAL REAL ESTATE ACTIVITY FROM THE STATE OF SOUTH CAROLINA

While the 2017 housing market was marked by renewed optimism fueled by stock market strength, higher wages and a competitive environment for home sales, 2018 delivered a more seasoned prudence toward residential real estate. Home buyers, now steeped in several years of rising prices and low inventory, became more selective in their purchase choices as housing affordability achieved a ten-year low.

Yet the appetite for home buying remained strong enough to drive prices upward in virtually all markets across the country. In fact, national home prices have risen 53 percent from February 2012 to September 2018. That mark is a less dramatic but still sizable 40 percent increase when inflation is factored in.

The national median household income was last reported with a year-over-year increase of 1.8 percent, while home prices have gone up 5.5 percent in roughly the same amount of time. That kind of gap can't be sustained indefinitely, but prices are still expected to rise in most areas, albeit at a much slower pace.

Sales: Pending sales increased 2.4 percent, closing 2018 at 81,434. Closed sales were up 4.0 percent to finish the year at 82,147.

Listings: Year-over-year, the number of homes available for sale was higher by 1.5 percent. There were 26,901 active listings at the end of 2018. New listings increased by 2.6 percent to finish the year at 108,899.

Bedroom Count: Increases in sales prices occurred across homes of all sizes over the last year. In 2018, properties with 4 bedrooms or More saw the largest growth at 7.4 percent. The highest percent of original list price received at sale went to properties with 3 bedrooms at 97.7 percent.

Prices: Home prices were up compared to last year. The overall median sales price increased 7.2 percent to \$203,600 for the year. Single Family home prices were up 6.4 percent compared to last year, and Condo home prices were up 4.8 percent.

List Price Received: Sellers received, on average, 97.4 percent of their original list price at sale, a year-over-year improvement of 0.2 percent. If demand shrinks in 2019, original list price received at sale could drop as well.

Consumer optimism has been tested by four interest rate hikes by the Federal Reserve in 2018. Meanwhile, GDP growth was at 4.2 percent in Q2 2018, dropped to 3.4 percent in Q3 2018 and is expected to be about 2.9 percent in Q4 2018 when figures are released.

Looking strictly at market fundamentals, recent Fed and GDP changes will not cause a dramatic shift away from the current state of the housing market. The booming sales at increased prices over the last several years may not be the same thrill ride to observe in 2019, but a long-awaited increase in inventory is something positive to consider, even if it arrives in the form of shrinking demand amidst rising mortgage rates.

The biggest potential problem for residential real estate in 2019 might be human psychology. A fear of buying at the height of the market could create home purchase delays by a large pool of potential first-time buyers, thus creating an environment of declining sales.

If the truth of a positive economic outlook coupled with responsible lending practices and more available homes for sale captures the collective American psyche, the most likely outcome for 2019 is market balance.

Table of Contents

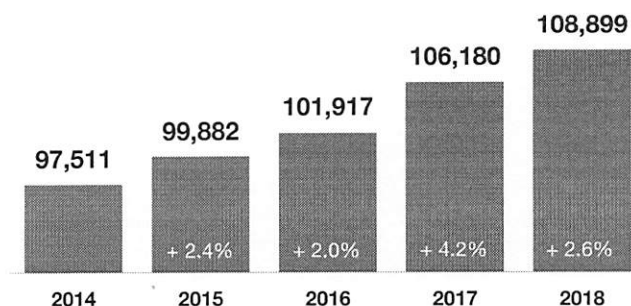
- 3 Quick Facts
- 5 Property Type Review
- 6 Bedroom Count Review
- 7 Price Range Review
- 8 Area Overviews
- 9 Area Historical Median Prices



2018 Annual Report on the South Carolina Housing Market

Quick Facts

New Listings



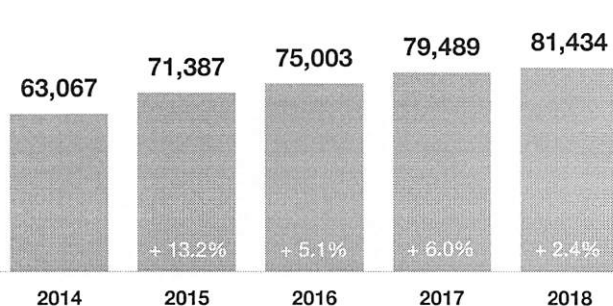
Top 5 Areas: Change in New Listings from 2017

Hilton Head	+ 11.1%
Beaufort	+ 11.0%
Spartanburg	+ 6.6%
Sumter	+ 6.6%
CMLS	+ 4.7%

Bottom 5 Areas: Change in New Listings from 2017

Greenwood	+ 0.1%
Aiken	- 0.9%
Coastal Carolinas	- 5.4%
Cherokee	- 10.3%
Piedmont	- 24.9%

Pending Sales



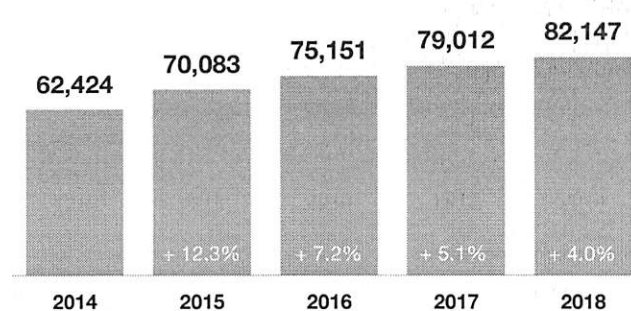
Top 5 Areas: Change in Pending Sales from 2017

Sumter	+ 15.6%
Southern Midlands	+ 11.0%
Hilton Head	+ 9.0%
Beaufort	+ 6.9%
CMLS	+ 6.6%

Bottom 5 Areas: Change in Pending Sales from 2017

Western Upstate	- 1.3%
Greenwood	- 2.6%
Pee Dee	- 7.2%
Cherokee	- 11.2%
Piedmont	- 28.6%

Closed Sales



Top 5 Areas: Change in Closed Sales from 2017

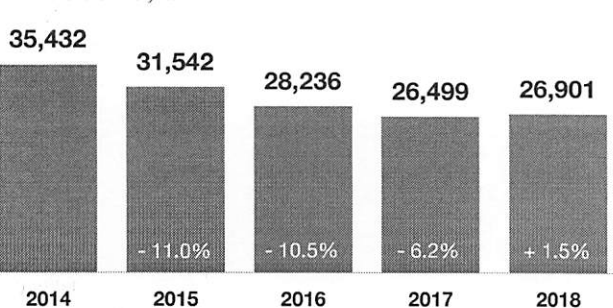
Southern Midlands	+ 15.0%
Sumter	+ 14.6%
Hilton Head	+ 9.8%
CMLS	+ 6.2%
Greater Greenville	+ 5.4%

Bottom 5 Areas: Change in Closed Sales from 2017

Aiken	+ 1.1%
Charleston Trident	- 1.4%
Greenwood	- 1.5%
Cherokee	- 7.9%
Piedmont	- 24.2%

Inventory of Homes for Sale

At the end of the year.



Top 5 Areas: Change in Homes for Sale from 2017

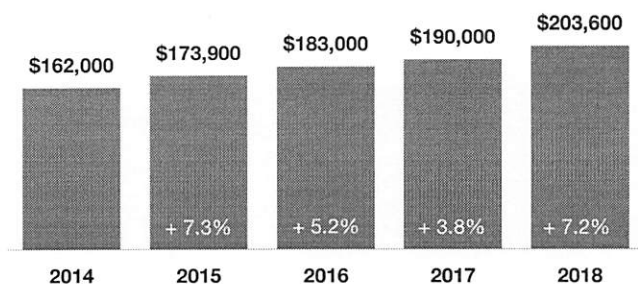
Sumter	- 4.8%
Hilton Head	- 5.3%
Charleston Trident	- 5.4%
Coastal Carolinas	- 6.6%
Greenwood	- 6.6%

Bottom 5 Areas: Change in Homes for Sale from 2017

Western Upstate	- 16.6%
Spartanburg	- 19.4%
Cherokee	- 21.3%
Piedmont	- 27.1%
Beaufort	- 32.1%

Quick Facts

Median Sales Price



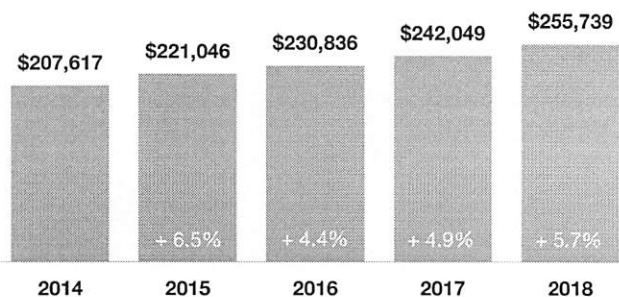
Top 5 Areas: Change in Median Sales Price from 2017

Cherokee	+ 14.5%
Beaufort	+ 11.9%
Piedmont	+ 10.7%
Greenwood	+ 10.6%
Spartanburg	+ 8.7%

Bottom 5 Areas: Change in Median Sales Price from 2017

Hilton Head	+ 5.0%
Western Upstate	+ 4.5%
Sumter	+ 4.1%
Pee Dee	+ 3.7%
Southern Midlands	+ 1.4%

Average Sales Price



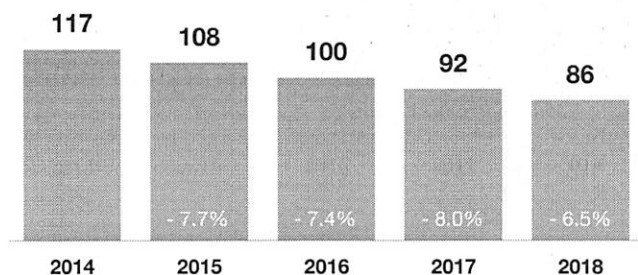
Top 5 Areas: Change in Avg. Sales Price from 2017

Cherokee	+ 22.4%
Beaufort	+ 13.0%
Piedmont	+ 11.3%
Spartanburg	+ 8.5%
Aiken	+ 7.9%

Bottom 5 Areas: Change in Avg. Sales Price from 2017

Hilton Head	+ 4.7%
CMLS	+ 4.5%
Sumter	+ 4.3%
Pee Dee	+ 3.0%
Southern Midlands	- 0.3%

Days on Market Until Sale



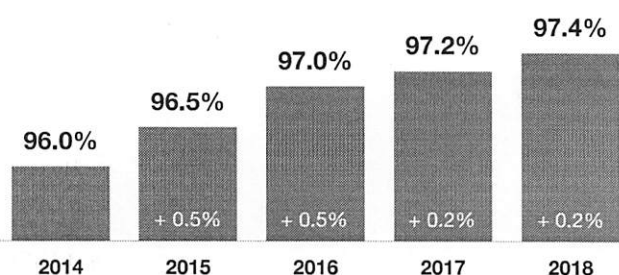
Top 5 Areas: Change in Days on Market from 2017

Western Upstate	+ 50.7%
Cherokee	+ 4.4%
Beaufort	+ 3.7%
Piedmont	- 1.0%
Coastal Carolinas	- 2.9%

Bottom 5 Areas: Change in Days on Market from 2017

Greenwood	- 10.9%
North Augusta	- 11.0%
CMLS	- 15.7%
Sumter	- 17.0%
Southern Midlands	- 19.6%

Percent of List Price Received



Top 5 Areas: Change in Pct. of List Price Received from 2017

Greenwood	+ 1.1%
Cherokee	+ 0.7%
Spartanburg	+ 0.7%
Hilton Head	+ 0.4%
Western Upstate	+ 0.3%

Bottom 5 Areas: Change in Pct. of List Price Received from 2017

Piedmont	+ 0.2%
Greater Greenville	+ 0.2%
Charleston Trident	+ 0.1%
Southern Midlands	- 0.1%
Beaufort	- 0.3%

2018 Annual Report on the South Carolina Housing Market



Property Type Review

84

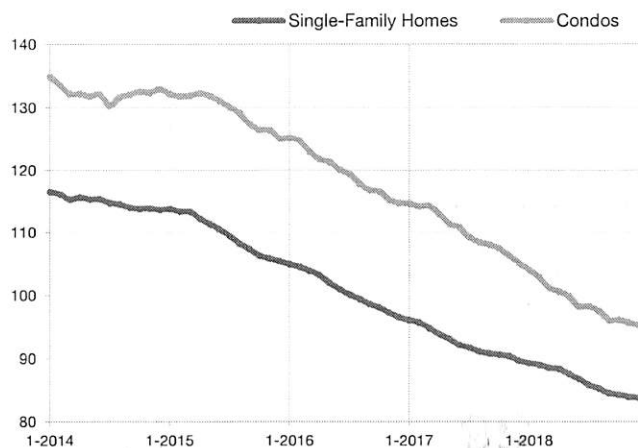
Average Days on Market
Single-Family Homes

95

Average Days on Market
Condos

Days on Market Until Sale

This chart uses a rolling 12-month average for each data point.



Top Areas: Condos Market Share in 2018

Coastal Carolinas	39.4%
Hilton Head	24.5%
Charleston Trident	17.8%
Beaufort	12.5%
Piedmont	7.9%
Greater Greenville	7.7%
Western Upstate	7.6%
Greenwood	7.3%
CMLS	6.9%
North Augusta	4.9%
Aiken	4.8%
Pee Dee	4.5%
Spartanburg	2.8%
Sumter	1.4%
Southern Midlands	0.5%

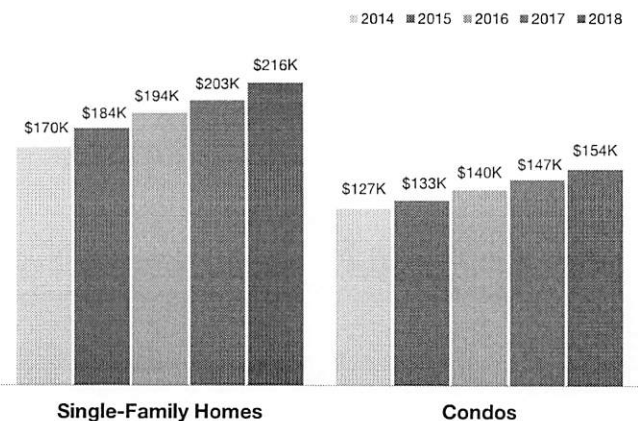
+ 6.4%

One-Year Change in Price
Single-Family Homes

+ 4.8%

One-Year Change in Price
Condos

Median Sales Price



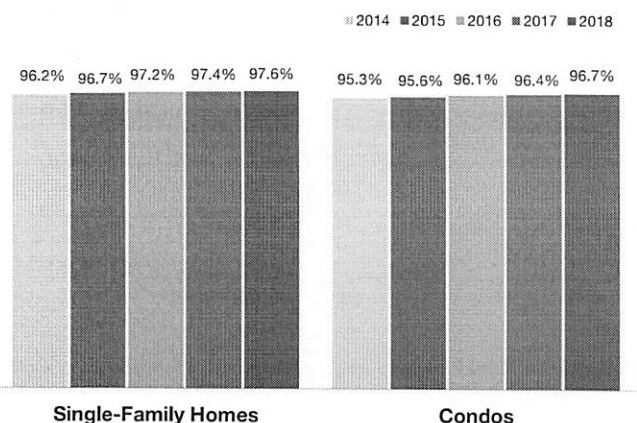
97.6%

Pct. of List Price Received
Single-Family Homes

96.7%

Pct. of List Price Received
Condos

Percent of List Price Received



2018 Annual Report on the South Carolina Housing Market



Bedroom Count Review

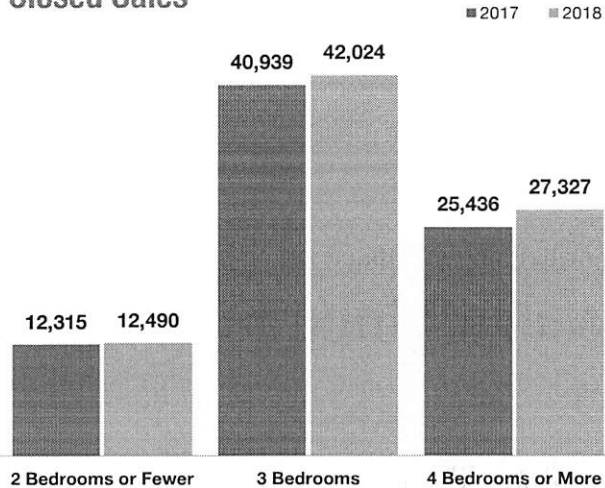
+ 1.4%

Growth in Closed Sales
2 Bedrooms or Fewer

+ 7.4%

Growth in Closed Sales
4 Bedrooms or More

Closed Sales



Top Areas: 4 Bedrooms or More Market Share in 2018

North Augusta	48.5%
CMLS	40.8%
Charleston Trident	38.9%
Greater Greenville	37.6%
Sumter	37.0%
Aiken	34.0%
Spartanburg	31.1%
Pee Dee	30.0%
Piedmont	29.7%
Western Upstate	28.6%
Beaufort	28.1%
Hilton Head	25.2%
Greenwood	24.2%
Southern Midlands	20.9%
Coastal Carolinas	20.5%

97.4%

Percent of List Price Received
in 2018 for
All Properties

95.9%

Percent of List Price Received
in 2018 for
2 Bedrooms or Fewer

97.7%

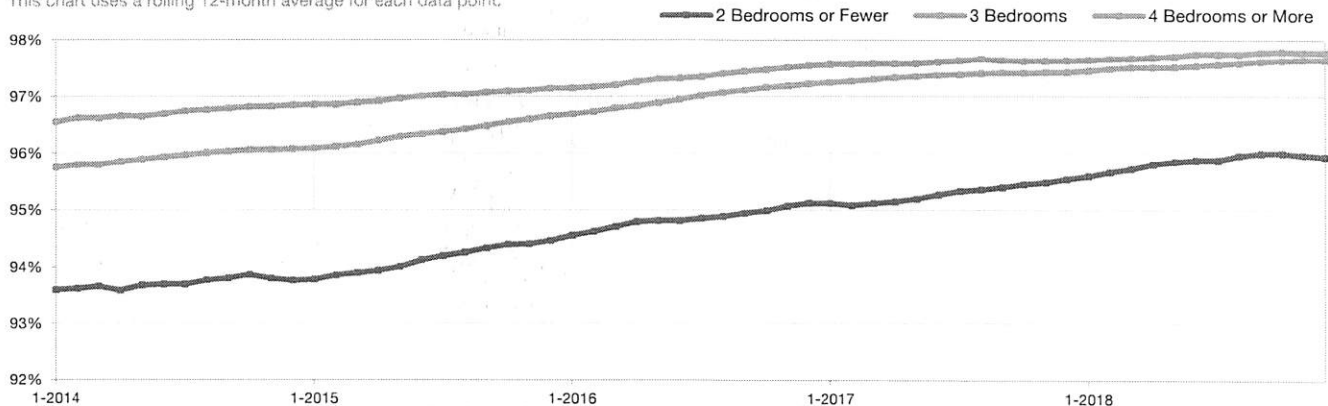
Percent of List Price Received
in 2018 for
3 Bedrooms

97.8%

Percent of List Price Received
in 2018 for
4 Bedrooms or More

Percent of List Price Received

This chart uses a rolling 12-month average for each data point.



Price Range Review

**\$100,001 to
\$150,000**

Price Range with
Shortest Average
Market Time

**\$300,001 and
Above**

Price Range with
Longest Average
Market Time

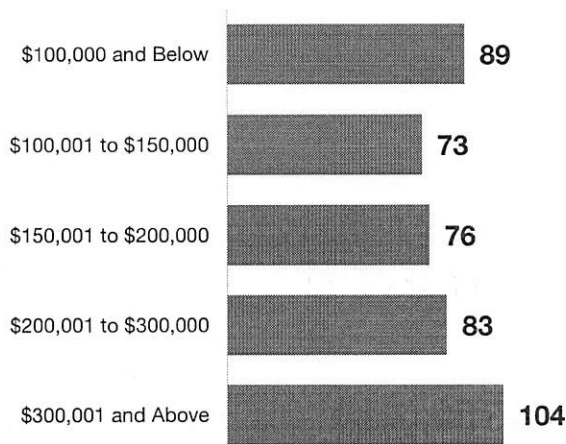
10.4%

of Homes for Sale
at Year End Priced
\$100,000 and Below

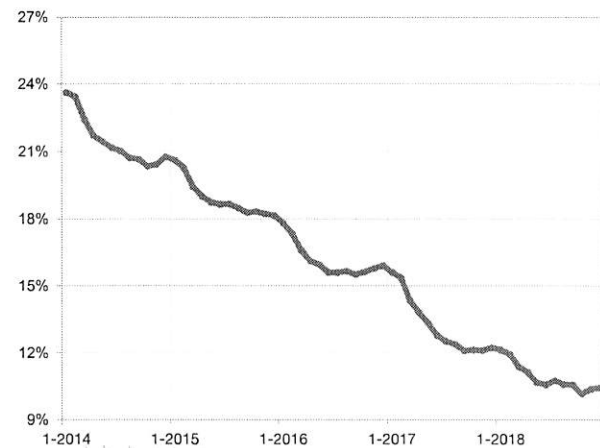
- 13.5%

One-Year Change
in Homes for Sale Priced
\$100,000 and Below

Days on Market Until Sale by Price Range



Share of Homes for Sale Priced at \$100,000 and Below



**\$200,001 to
\$300,000**

Price Range with the
Most Closed Sales

+ 14.0%

Growth for Price Range with
Strongest 1-Year Change in
Sales: \$300,001 and Above

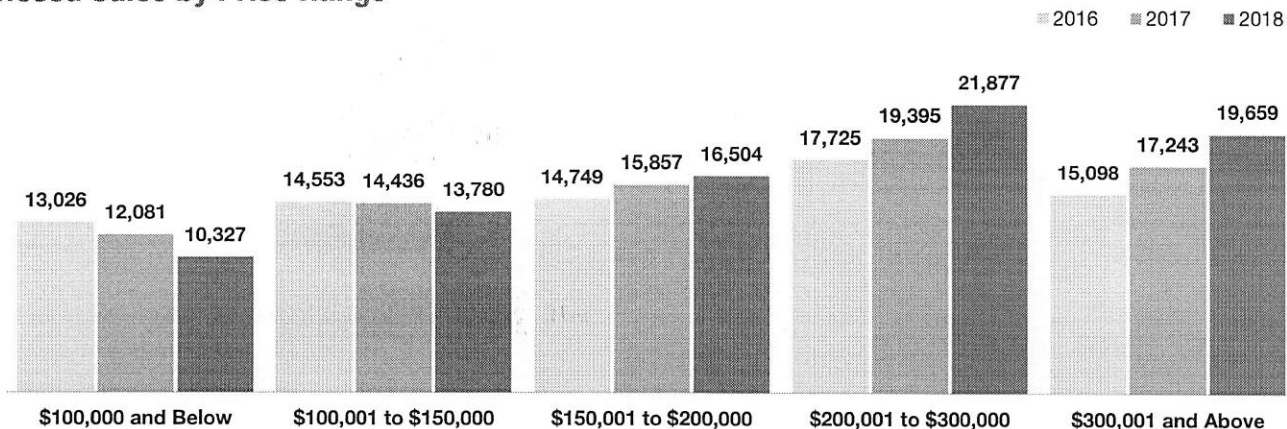
**\$100,000 and
Below**

Price Range with the
Fewest Closed Sales

- 14.5%

Growth for Price Range with
Weakest 1-Year Change in
Sales: \$100,000 and Below

Closed Sales by Price Range





2018 Annual Report on the South Carolina Housing Market

Area Overviews

	Total Closed Sales	Change from 2017	Percent Condos	Percent 2 Beds or Fewer	Percent \$100K or Less	Days on Market	Pct. of List Price Received
Aiken	2,372	+ 1.1%	4.8%	11.8%	18.9%	137	96.7%
Beaufort	2,216	+ 3.4%	12.5%	15.0%	13.9%	85	96.7%
Charleston Trident	18,160	- 1.4%	17.8%	13.2%	5.0%	52	98.1%
Cherokee	384	- 7.9%	0.0%	16.9%	37.8%	94	97.2%
Greater Columbia	13,646	+ 6.2%	6.9%	9.6%	15.9%	59	97.3%
Coastal Carolinas	14,642	+ 1.2%	39.4%	26.5%	15.1%	136	96.9%
Greater Greenville	13,678	+ 5.4%	7.7%	10.0%	8.0%	51	98.1%
Greenwood	932	- 1.5%	7.3%	19.2%	32.0%	114	96.2%
Hilton Head	5,157	+ 9.8%	24.5%	32.0%	3.0%	134	96.6%
North Augusta	8,020	+ 1.5%	4.9%	8.5%	17.2%	113	97.9%
Pee Dee	2,292	+ 2.3%	4.5%	9.6%	34.2%	132	95.9%
Piedmont	1,540	- 24.2%	7.9%	13.0%	17.3%	95	97.6%
Southern Midlands	407	+ 15.0%	0.5%	12.0%	46.4%	185	93.3%
Spartanburg	5,248	+ 4.7%	2.8%	10.2%	16.5%	97	97.9%
Sumter	1,882	+ 14.6%	1.4%	7.2%	23.3%	132	96.7%
Western Upstate	5,341	+ 1.9%	7.6%	13.6%	17.2%	104	96.6%
State Totals**	82,147	+ 4.0%	15.9%	15.2%	12.6%	86	97.4%

* The Percent of List Price Received noted for Charleston Trident and Greater Pee Dee is actually a calculation of the Percent of Original List Price Received.

** State Totals are not a summation of the areas in the table. This is done so as not to double-count any listings that may be found in more than one MLS.

Area Historical Median Prices

	2014	2015	2016	2017	2018	Change From 2017	Change From 2014
Aiken	\$143,000	\$147,450	\$155,098	\$165,000	\$173,250	+ 5.0%	+ 21.2%
Beaufort	\$153,950	\$169,900	\$193,000	\$209,950	\$235,000	+ 11.9%	+ 52.6%
Charleston Trident	\$215,000	\$229,000	\$240,000	\$251,500	\$266,500	+ 6.0%	+ 24.0%
Cherokee	\$74,151	\$80,875	\$101,500	\$113,500	\$129,950	+ 14.5%	+ 75.3%
Greater Columbia	\$147,000	\$150,000	\$159,500	\$160,000	\$169,900	+ 6.2%	+ 15.6%
Coastal Carolinas	\$155,000	\$164,000	\$169,000	\$176,500	\$186,019	+ 5.4%	+ 20.0%
Greater Greenville	\$159,900	\$169,935	\$180,000	\$189,000	\$205,000	+ 8.5%	+ 28.2%
Greenwood	\$114,000	\$115,000	\$129,300	\$128,400	\$142,000	+ 10.6%	+ 24.6%
Hilton Head	\$260,500	\$276,000	\$292,500	\$300,000	\$314,995	+ 5.0%	+ 20.9%
North Augusta	\$152,490	\$156,100	\$165,000	\$170,000	\$180,000	+ 5.9%	+ 18.0%
Pee Dee	\$118,000	\$130,000	\$134,000	\$134,900	\$139,900	+ 3.7%	+ 18.6%
Piedmont	\$151,500	\$160,000	\$162,000	\$171,700	\$190,000	+ 10.7%	+ 25.4%
Southern Midlands	\$80,200	\$89,900	\$99,450	\$113,375	\$115,000	+ 1.4%	+ 43.4%
Spartanburg	\$125,000	\$135,000	\$145,000	\$155,000	\$168,500	+ 8.7%	+ 34.8%
Sumter	\$129,600	\$127,500	\$134,950	\$144,000	\$149,900	+ 4.1%	+ 15.7%
Western Upstate	\$137,000	\$149,900	\$152,000	\$165,000	\$172,500	+ 4.5%	+ 25.9%
State Totals**	\$162,000	\$173,900	\$183,000	\$190,000	\$203,600	+ 7.2%	+ 25.7%

* The Percent of List Price Received noted for Charleston Trident and Greater Pee Dee is actually a calculation of the Percent of Original List Price Received.

** State Totals are not a summation of the areas in the table. This is done so as not to double-count any listings that may be found in more than one MLS.

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WORKHORSE MOVING AND STORAGE, LLC)
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For a Class E (Household Goods) Certificate of Public)
Convenience and Necessity for Operation of a Motor)
Vehicle)

**CERTIFICATE OF
SERVICE**

This is to certify that I, Vicki L. Watts, have this date served one (1) copy of the
**CONSENT MOTION FOR PERMISSION TO PRESENT SHIPPER WITNESS
TESTIMONY BY AFFIDAVIT (with attached Exhibits A and B)** in the above-referenced
matter to the person(s) named below by causing said copy to be electronically mailed, addressed
as shown below:

Jared Wood
Workhorse Moving and Storage LLC

C. Lessie Hammonds, Esq.
Office of Regulatory Staff

Jared.wood1987@gmail.com

lhammonds@ors.sc.gov

s/C. Fredric Marcinak

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Mosely Marcinak Law Group LLP
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Fred.Marcinak@momarlaw.com
Attorneys for Applicant

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August 22, 2019
109838.2